

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT DEC 19 PM 3:56  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

UNITED STATES OF AMERICA,

) I N F O R M A T I O N

Plaintiff,

)

v.

) CASE NO.

RYAN DRISCOLL,

Title 18, Sections 1955 and  
1956(a)(1)(B)(i), United States  
Code; Title 26, Section 7206(1),  
United States Code

Defendant.

JUDGE BOYKO

COUNT 1

(Prohibition of Illegal Gambling Business, 18 U.S.C. § 1955)

The United States Attorney charges:

1. From on or about July 29, 2015, and continuing until on or about August 8, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant RYAN DRISCOLL did conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, to wit: a gambling business involving sports betting which gambling business was a violation of the laws of the State of Ohio, that is, O.R.C. 2915.02(A)(1), which also involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of said illegal gambling business, and which remained in substantially continuous operation for a period in excess of thirty days or had a gross revenue of \$2,000.00 in any single day, in violation of Title 18, United States Code, Section 1955.

COUNT 2  
(Money Laundering, 18 U.S.C. § 1956(a)(1)(B)(i))

The United States Attorney further charges:

2. On or about July 17, 2019 in the Northern District of Ohio, Eastern Division, and elsewhere defendant RYAN DRISCOLL did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: making a payment to his country club membership at “The Mayfield Sand Ridge Club,” which involved the proceeds of a specified unlawful activity, that is, operating an illegal gambling businesses, in violation of Title 18, United States Code, Section 1955, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature and source of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18 United States Code Sections 1956(a)(1)(B)(i).

COUNT 3  
(Filing False Tax Return, 26 U.S.C. § 7206(1))

The United States Attorney further charges:

3. On or about April 13, 2018, in the Northern District of Ohio, Eastern Division, defendant RYAN DRISCOLL, a resident of Aurora, Ohio, who was married, did willfully make and subscribe, jointly with his spouse, a United States Individual Income Tax Return (Form 1040) for the calendar year 2017, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, and which defendant did not believe to be true and correct as to every material matter in that, as he then and there well knew and believed, the return understated his total income on line 22 by failing to report the

proceeds of his illegal gambling business, and that he knew that in fact his reported gross and total incomes were false and that his actual gross and total incomes substantially exceeded the amounts reported, in violation of Title 26, United States Code, Section 7206(1).

FORFEITURE

The United States Attorney further charges:

4. The allegations of Count 1 are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 1955(d), and Title 28, United States Code, Section 2461(c). As a result of the foregoing offense, defendant RYAN DRISCOLL shall forfeit to the United States: (i) all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense; and, (ii) all property, including money, used in violation of the provisions of Title 18, United States Code, Section 1955; including, but not limited to, the following:

a.) A total of \$1,047,054.00 U.S. Currency recovered at defendant RYAN DRISCOLL's Aurora, Ohio, residence on August 8, 2019, pursuant to the execution of a search warrant.

JUSTIN E. HERDMAN  
United States Attorney

By:   
BRIDGET M. BRENNAN  
First Assistant United States Attorney